

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
Eastern Division (Cleveland)**

Inez Nieves and Betsy Ramos, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

Lorain County, an Ohio political subdivision unit of government; and **Craig Snodgrass**, in his official capacity as Lorain County Auditor,

Defendants.

Case Number: 1:24-cv-01861

NOTICE OF CONSTITUTIONAL QUESTION

Pursuant to Rule 5.1 of the Federal Rules of Civil Procedure, Plaintiffs provide notice that the complaint in this action draws into question the constitutionality of Ohio's statutory tax-foreclosure system to the extent such system results in the taking of private property without just compensation or in the imposition of excessive fines in violation of the Fifth or Eighth Amendments of the United States Constitution.

Plaintiffs are also serving this Notice and a copy of the complaint on the Attorney General of the State of Ohio on the date of this filing.

Dated: October 25, 2024

Respectfully submitted,

/s/ Joseph P. Ashbrook

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